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VIA HAND DELIVERY

September 6, 2005

Beth O'Donnell Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602-0615 SF2 0 5 2005 Sympolytops

Re:

In the Matter of: Application Of Big Rivers Electric Corporation For Approval Of Electrical Interconnection Service To Thoroughbred Generating Company, LLC, Case No. 2005-00300

Dear Ms. O'Donnell:

Enclosed herewith please find for filing with the Commission the original and ten (10) copies of the Motion Of Thoroughbred Generating Company, LLC For Full Intervention in the above styled matter.

Please do not hesitate to contact the undersigned should you have any questions concerning this filing.

Sincerely,

Holland N. McTyeire, V

Jun Motyaire

HNM/jh

Enclosures

cc:

A.W. Turner Dianna Tickner Peter K. Matt Carl W. Breeding Carolyn M. Brown

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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR APPROVAL OF ELECTRICAL INTERCONNECTION SERVICE TO THOROUGHBRED GENERATING COMPANY, LLC

Case No. 2005-00300

MOTION OF THOROUGHBRED GENERATING COMPANY, LLC FOR FULL INTERVENTION

Thoroughbred Generating Company, LLC ("Thoroughbred"), through counsel, hereby Moves the Commission, pursuant to 807 KAR 5:001 Section3(8) and the Commission's August 24, 2005 Order, for Full Intervention in the *Application Of Big Rivers Electric Corporation For Approval Of Electrical Interconnection Service To Thoroughbred Generating Company, LLC*, Case No. 2005-00300. The grounds in support of Thoroughbred's Motion are set forth below.

- 1. As a signatory to the Interconnection and Operating Agreement (the "Agreement"), Thoroughbred has a unique interest in this proceeding. Thoroughbred seeks to participate in this matter in order to protect its interest in the Commission's consideration of the Agreement between Big Rivers Electric Corporation ("BREC") and Thoroughbred.
- 2. Thoroughbred's participation in this matter will not prejudice the rights of any party.

Although Thoroughbred's interests are similar to those of BREC in that each 3.

party advocates the approval of the Agreement, Thoroughbred's participation in this proceeding

may be of some assistance to the Commission.

Thoroughbred endorses the Commission's approval of the Agreement and 4.

requests that the Commission approve it as soon as practical. Thoroughbred is willing to assist

the Commission as appropriate, although there should be little, if any, additional information

needed for approval of the Agreement.

The following individuals should be added to the Service List for Thoroughbred 5.

and their address is set forth below. All pleadings and correspondence in this matter should be

directed to their attention.

Carl W. Breeding

Holland N. McTyeire, V

Carolyn M. Brown

GREENEBAUM DOLL & MCDONALD PLLC

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2

For the reasons set forth above, the Motion Of Thoroughbred Generating Company, LLC For Full Intervention should be granted.

Respectfully submitted,

Carl W. Breeding

Holland N. McTyeire, V

Carolyn M. Brown

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COUNSEL FOR THOROUGHBRED GENERATING COMPANY, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Motion Of Thoroughbred Generating Company, LLC For Full Intervention was mailed sufficient U.S. postage prepaid, to James M. Miller, Sullivan, Mountjoy, Stainback & Miller, PSC, 100 St. Ann Street, P.O. Box 727, Owensboro, Kentucky 42302-0827, counsel for Big Rivers Electric Corporation on this 6th day of September, 2005.

COUNSEL FOR THOROUGHBRED

GENERATING COMPANY, LLC

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